

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KIANA LYONS,

Plaintiff,

v.

INGLIS HOUSE,

Defendant.

Civil Action No. 2:21-cv-01233

**JOINT DISCOVERY PLAN**

The Parties, by and through the undersigned counsel, have met and conferred in accordance with Rule 26(f) and submit the following joint discovery plan:

1. **Initial Disclosures.** The parties have agreed to exchange information required by Fed. R. Civ. P. 26(a)(1) by August 6, 2021.

2. **Anticipated Scope of Discovery.** Counsel for the Parties agree that the subjects for discovery include:

- a. Ms. Lyons' employment, the termination of Ms. Lyons' employment and Ms. Lyons' grievance of the termination of her employment.
- b. Ms. Lyons' medical conditions and requests for medical leave during her employment with Defendant.
- c. Ms. Lyons' claims and Defendant's defenses.
- d. Ms. Lyons' damages and mitigation efforts.

3. **Discovery of Electronic Information.** At this time, it is not anticipated that there will be any issues with respect to disclosure of discovery of electronically stored information that will require the Court's attention. Counsel anticipate that they will be able to work together with respect

to any electronic discovery issues that might arise. The parties have agreed to produce electronic information in PDF format.

**4. Discovery End Date:**

- a. **Fact Discovery:** December 19, 2021.
- b. **Expert Discovery:** January 20, 2022.
- c. **Dispositive Motions:** January 25, 2022.
- d. **Protective Orders:** The parties will submit a proposed confidentiality order.
- e. **Trial date:** 60 days following decision on dispositive motions.

**5. Do you anticipate any discovery problems?** Not at this time.

**6. Do you anticipate any special discovery needs?** No.

**7. Settlement Conference.** Ms. Lyons has conveyed a demand to Defendant is in the process of determining whether and when a settlement conference will be useful based on that demand.

**8. Trial by magistrate judge.** We do not consent at this time to the trial being conducted by a Magistrate Judge.

Respectfully submitted,

Dated: August 3, 2021

s/ Allison A. Barker

W. Charles Sipio  
csipio@karpf-law.com  
Allison A. Barker  
abarker@karpf-law.com  
Karpf, Karpf & Cerutti, P.C.  
3331 Street Road  
Two Greenwood Square  
Suite 128  
Bensalem, PA 19020  
Telephone: 215.639.0801

*Attorneys for Plaintiff*

s/ Nina K. Markey

Nina K. Markey, Bar No. 201801  
nmarkey@littler.com  
Tara Param, Bar No. 323171  
tparam@littler.com  
LITTLER MENDELSON P.C.  
Three Parkway  
1601 Cherry Street, Suite 1400  
Philadelphia, PA 19102.1321  
Telephone: 267.402.3000  
Facsimile: 267.402.3131

*Attorneys for Defendant, Inglis House*